

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re)	
)	Chapter 11
General Motors Corp., et. al.,)	Case No. 09-50026 (REG)
)	(Jointly Administered)
Debtors.)	
)	
)	
)	

**OBJECTION TO NOTICE OF SALE HEARING TO SELL SUBSTANTIALLY
ALL OF DEBTORS' ASSETS PURSUANT TO MASTER SALE AND PURCHASE
AGREEMENT WITH VEHICLE ACQUISITION HOLDINGS LLC, A U.S.
TREASURY-SPONSORED PURCHASER**

NOW COMES the Creditor, GERALD HAYNOR, who hereby objects to Debtors' motion stating more fully as follows:

1. The Creditor, GERALD HAYNOR, has recently obtained a favorable ruling entitling the Creditor to a pension liability award from the Debtor. (See **Exhibit A**). That the Debtor has gone to extreme lengths to avoid paying anything to the Creditor leading up to the bankruptcy making Debtor's intentions highly suspect. (See **Exhibit B**).
2. The Debtor has subsequently filed for bankruptcy and has given Creditor less than nineteen (19) days in which to digest and process the factual and legal arguments contained within the motion at issue along with the impact which it may have on the Creditor's claim against Debtor.

3. It appears that not once in does the Debtor expressly state the impact that the relief sought in its motion will have on GERALD HAYNOR a known creditor (or even those individuals similarly situated to the Creditor). While it has been widely known that Debtor intended to file bankruptcy, the details of that process including the impact it would have on various classes of creditors was not disclosed. Certainly, the Debtor did not disclose the present motion and supporting documentation before the filing of bankruptcy.
4. Furthermore, the Debtor in its brief has noted that it intends to bring additional facts to the Court's attention at the hearing which underscores the fact that there remain questions which need to be answered before the Creditor should be required to respond.
5. Accordingly, the Creditor needs all of the pertinent facts along with an explanation as to the impact the motion will have on this Creditor before the Creditor can be in a position to properly assess whether further opposition is warranted.
6. That Debtors' decision to keep the details of its bankruptcy plan hidden (i.e. its motion) until after the filing underscores the need for this Court to Order Debtor to provide a candid and specific response to the concerns of this particular Creditor so that this Creditor can be in a position to respond. For example, it is necessary for the Debtor to explain how the proposed sale will impact Creditor's rights (and ability) to recover the monies owed him before the Creditor is forced to respond and the Court issues its ruling.

7. The Creditor will be unfairly prejudiced (and will be deprived of his Due Process Rights) if the relief sought in this Objection are not granted.

WHEREFORE, the Creditor, GERALD HAYNOR, respectfully requests that the Court grant the relief requested in this response.

Respectfully Submitted,

THE MASTROMARCO FIRM

Dated: June 17, 2009

By: _____
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